

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

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Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**Objection Deadline: February 26,  
2024 at 4:00 p.m. (ET)**

**SUMMARY OF SECOND MONTHLY FEE APPLICATION OF MEMBERS OF  
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
FOR REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM  
OCTOBER 1, 2023 THROUGH OCTOBER 31, 2023**

Name of Applicant:	Wintermute Asia PTE. Ltd., as Committee Member
Authorized to Provide Professional Services to:	Official Committee of Unsecured Creditors (“ <u>Committee</u> ”)
Date of Appointment:	December 15, 2022 [D.I. 231 & 261]
Period for Which Expense Reimbursement is Sought:	October 1, 2023 through and including October 31, 2023 (the “ <u>Fee Period</u> ”)
Total Amount of Expense Reimbursement as Actual, Reasonable and Necessary:	\$2,171.66

This is a(n):   X   monthly \_\_\_ interim \_\_\_ final application.

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s tax identification number are 3288. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

**WINTERMUTE ASIA PTE. LTD.**  
**EXPENSE SUMMARY**<sup>2</sup>

<b>Expense Category</b>	<b>Total Expenses*</b>
Airfare**	\$839.12
Lodging in New York City	\$1,182.61
Meals in New York City	\$38.08
Taxi	\$111.85
<b>TOTAL</b>	<b>\$2,171.66</b>

\* Certain expenses were incurred in foreign currency, and have been converted to USD using the prevailing exchange rates on January 10, 2024.

\*\* Representatives of Wintermute Asia PTE. Ltd. traveled to New York City for in-person meetings with the Debtors and certain other stakeholders.

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<sup>2</sup> The supporting receipts of Wintermute Asia PTE. Ltd. are attached hereto as Exhibit A.

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**SECOND MONTHLY FEE APPLICATION OF MEMBERS OF  
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
FOR REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM  
OCTOBER 1, 2023 THROUGH OCTOBER 31, 2023**

Pursuant to 11 U.S.C. §§ 105 and 330 of the United States Bankruptcy Code, Wintermute Asia PTE. Ltd. (the “Committee Member”), as a member of the Official Committee of Unsecured Creditors (the “Committee”) appointed in the chapter 11 cases (the “Chapter 11 Cases”) of the above-captioned debtors and debtors-in-possession (the “Debtors”), hereby moves this Court for an order awarding them reasonable, actual and necessary expenses incurred as Committee Member in the aggregate amount of \$2,171.66 for the period commencing October 1, 2023, through and including October 31, 2023 (the “Fee Period”). In support of their Application, the Committee Member respectfully states as follows:

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s tax identification number are 3288. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

### **BACKGROUND**

1. On November 11 and November 14, 2022, the Debtors filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code with this Court. The Debtors continue to operate their businesses and manage their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. As of the date hereof, no trustee or examiner has been appointed in the Chapter 11 Cases.

2. On November 7, 2023, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) filed the *Second Amended Notice of Appointment of Committee of Unsecured Creditors* [Docket No. 3685].<sup>2</sup>

3. On January 9, 2023, the Court entered the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 435] (the “Interim Compensation Order”). Under the terms of the Interim Compensation Order, Committee members may submit statements of reasonable, out-of-pocket expenses incurred in the performance of the duties of the Committee.

4. During the Fee Period, while serving as a member of the Committee, Wintermute Asia PTE. Ltd. incurred out-of-pocket expenses in the total amount of \$2,171.66. A true and correct copy of their supporting receipts are attached hereto as Exhibit A.

### **RELIEF REQUESTED**

5. Pursuant to the Interim Compensation Order and sections 105, 331 and 503(b)(3)(F) of the Bankruptcy Code, the Committee Member respectfully request reimbursement

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<sup>2</sup> The notice amended the initial *Notice of Appointment of Committee of Unsecured Creditors* [Docket No. 231] issued by the U.S. Trustee on December 15, 2022, to reflect the addition and correction of contact information for certain of the members of the Committee, and to reflect the resignations of Acaena Amoros Romero and GGC International Ltd. from the Committee.

of their reasonable, actual, and necessary expenses incurred in these cases in the amount of \$2,171.66.

**REIMBURSEMENT OF REASONABLE, ACTUAL,  
AND NECESSARY EXPENSES IS APPROPRIATE**

6. The “majority of courts agree that committee members should be reimbursed for their expenses, e.g. costs related to attending committee meetings.” *Creditors Comm. Chairman v. Fibrex, Inc. (In re Fibrex, Inc.)*, 240 B.R. 714, 717 (Bankr. S.D. Ind. 2001). Section 503(b)(3)(F) permits a member of a committee appointed under section 1102 of the Bankruptcy Code to “timely file a request for payment of an administrative expense” if such expenses are incurred in the performance of the duties of a duly appointed committee. *Id.*

7. Accordingly, the Committee Member respectfully requests reimbursement of their expenses in the amount of \$2,171.66 for the Fee Period.

8. To the extent that charges for disbursements incurred relate to the Fee Period, but were not processed before the preparation of this Application, the Committee reserves the right to request additional reimbursement of such expenses in a future application.

**NOTICE AND NO PRIOR REQUEST**

9. Notice of this Monthly Fee Statement has been given to the following parties or, in lieu of, to their counsel, if known: (a) the U.S. Trustee, (b) the Debtors, (c) the Committee, (d) the Fee Examiner, and (e) all parties required to be given notice in the Interim Compensation Order. The undersigned submits that no other or further notice is necessary.

10. No prior request for the relief sought in this Application for expenses incurred during the Fee Period has been made to this or any other Court.

**WHEREFORE**, the Committee Member requests that allowance and payment be made in the sum of \$2,171.66 for reimbursement of reasonable, actual, and necessary costs and

expenses incurred by the Committee Member during the Fee Period, and further requests such other and further relief as this Court may deem just and proper.

Dated: February 6, 2024  
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Jared W. Kochenash

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